



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

AXB
F. #2018R2095

*271 Cadman Plaza East
Brooklyn, New York 11201*

March 15, 2019

By ECF

The Honorable Ann M. Donnelly
United States District Judge
Eastern District of New York
Brooklyn, New York 12201

Re: United States v. Insun Yun
Criminal Docket No. 19-131 (AMD)

Dear Judge Donnelly:

The parties to the above-referenced matter have reached a plea agreement, pursuant to which the defendant has agreed to waive indictment by the grand jury and plead guilty to a felony information. On March 11, 2019, the government filed a notice of intent to proceed in this manner pursuant to Federal Rule of Criminal Procedure 7(b). Therefore, the government respectfully requests that the Court schedule a plea hearing at its earliest convenience.

Respectfully submitted,

RICHARD P. DONOGHUE
United States Attorney

By: /s/ Anthony Bagnuola
Anthony Bagnuola
Assistant U.S. Attorney
(718) 254-6232

cc: Counsel of record (by ECF)